

March 21, 2007

Federal Communications Commission  
Office of the Secretary  
9300 East Hampton Drive  
Capitol Heights, MD 20743

*Re: FCC Request for Review  
CC Docket No. 02-6  
CC Docket No. 96-45*

Dear Reviewers:

This purpose of this letter is to humbly request a review of the following concerning the USAC-SLD **denial** of Leggett Independent School District's funding request. This request concerns:

**Leggett Independent School District ("LISD")**  
**Billed Entity Number – 141253**  
**Form 471 Number – 534503**  
**FRN 1477938 "Basic Maintenance of Internal Connections"**

The denial of this FRN was based on the fact that the basic maintenance for existing eligible equipment was deemed not cost effective as required by the Schools and Libraries Support Mechanism's rules and procedures. Unfortunately, we have never been apprised of these rules and procedures concerning cost effectiveness, nor are there any guidelines from the SLD when queried about them. At a recent SLD training in Houston, TX the representatives from the SLD were asked what is the cost effectiveness bright line that we should follow for basic maintenance, there was no answer given. The problem with the action the SLD takes on these matters is that they just deny the FRN without any questions, reduction of funding or adjustments to the FRN.

They quote you the cost per student and cost of maintenance for each piece of eligible equipment associated with this FRN, but do not explain what a reasonable cost for each of these are. For this particular District, they have no technology coordinator and rely upon the company that they contract with

to provide the maintenance for the District. The SLD quoted in their denial letter that the cost per piece of equipment (\$2,121.95) and cost per student (\$378.26) was not cost effective but, instead of stating what is cost effective in this Districts case, or a reduction of funding, they just denied the whole request.

These amounts were determined by the SLD by dividing the number of line items we sent as an eligible equipment list and the number of students into the total cost, to come up with those numbers. These line items are just that, line items, but they contain more equipment than a single piece. We did not feel it was proper to list each individual cable drop or NIC card as separate items, for example. We listed cable drops and NIC cards as one item, but if we did list everything as a single item, the cost per piece of equipment would go down significantly. As you will notice on the equipment list included, there are 780 pieces of equipment listed instead of the 42 line items the SLD used for their calculations, which would drop the cost per piece of equipment to \$114.26 which certainly seems to be a reasonable amount.

The following is a table showing examples of school districts maintained by this particular service provider that were NOT denied and their respective associated costs:

#### **"Basic" Maintenance Cost Comparisons**

<b>Item Number</b>	<b>School Name</b>	<b>Total Maint. Cost</b>	<b>Number of Students</b>	<b>Cost per Student</b>	<b>Number of Line items of Equipment</b>	<b>Cost per Piece of Equip.</b>
A	District "1"	\$88,740.00	250	\$354.96	41.8	\$2,121.95 *
B	District "2"	\$38,756.00	329	\$117.80	23	\$1,685.04 *
C	District "3"	\$73,680.00	280	\$263.14	25	\$2,947.20 *
D.	District "4"	\$39,450.00	118	\$334.32	21	\$1,878.57 *
E	District "5"	\$25,000.00	60	\$416.67	23	\$1,086.96 *
F	District "6"	\$34,818.00	1326	\$26.26	76	\$458.13 *

**\* This cost is based on the number of line items as the SLD used instead of total number of pieces of equipment.**

Leggett ISD				07.01.06		
Eligible Equipment List						
Quant	Type	Part #	Description:	Serial Number:	Location:	
Servers						
A	1	Server	PE2600	Dell Poweredge 2600 (Terminal Services) - Allows Remote Desktop Connections	33NW261	MC (High School)
B	1	Server	PE6600	Dell Poweredge 6600 (DNS) - Matches IP addresses to workstation names.	75JFZ51	MC (High School)
C	1	Server	PE2600	Dell Poweredge 2600 (DHCP) - Gives IP addresses to workstations.	66S2551	MC (High School)
Switches						
D	1	Switch	3C17702-US	3com SuperStack 3 fiber switch	LL1T3YA86F6E0	MC (High School)
E	1	Switch	3C17204-US	3com 48-port 10/100Base-TX w/module 1000Base-SX	L6EV448302760	MC (High School)
F	1	Switch	3C16986A-US	3com 24-port 10/100Base-TX 1 uplink 1000Base-T	7MBV2787EBED8	MC (High School)
G	1	Switch	3C16476A-US	3com 48-port 10/100Base-TX 2 10/100/1000Base-TX or SFP slots	76KF3J0004013	MC (High School)
H	1	Switch	3C16985B-US	3com 24-port 10/100Base-TX	7MAV1M7B41DC8	MC (High School)
I	1	Switch	3C16987A-US	3com 24-port 10/100Base-TX 1 uplink 1000Base-SX	KMCS5A8FAF8C	MC (High School)
J	1	Switch	3C16987A-US	3com 24-port 10/100Base-TX 1 uplink 1000Base-SX	7MCV18735BD98	MC (High School)
K	1	Switch	3C10220-US	3Com Powered Switch	M03096101516656	MC (High School)
L	1	Switch	3C17204-US	3com 48-port 10/100Base-TX w/module 1000Base-TX	L6EV3UB169480	IC (Elementary)
M	1	Switch	3C16988A-US	3com 24-port 10/100Base-TX Multi-Matrix (3)	7MDVIL7ACBA58	IC (Elementary)
N	1	Switch	3C16987A-US	3com 24-port 10/100Base-TX 1 uplink 1000Base-SX	7MCV1K7AA0C08	IC (Elementary)
O	1	Switch	3C17204-US	3com 48-port 10/100Base-TX w/module 1000Base-SX	L6EV3YB2BF080	Admin Closet
P	1	Switch	3C16987A-US	3com 24-port 10/100Base-TX 1 uplink 1000Base-SX	7MCV1G7DF79B8	Admin Closet
Q	1	Switch	3C17204-US	3com 48-port 10/100Base-TX w/module 1000Base-SX	L6EV3UB168100	Rock Bldg Closet
R	1	Switch	3C16987A-US	3com 24-port 10/100Base-TX 1 uplink 1000Base-SX	7MCV107CC5758	Rock Bldg Closet
S	1	Switch	3C17204-US	3com 48-port 10/100Base-TX w/module 1000Base-SX	L6EV3YB2BFD00	Jr. High Closet
T	1	Switch	3C16987A-US	3com 24-port 10/100Base-TX 1 uplink 1000Base-SX	7MCV1K7AA23B8	Jr. High Closet
UPS's						
U	1	UPS	SMART500RT1U	Tripp-lite Smart 500	9437ALCSM513900585	Admin
V	1	UPS	SMART500RT1U	Tripp-lite Smart 500	9310ALCSM472601234	Rock Bldg Closet
W	1	UPS	SMART500RT1U	Tripp-lite Smart 500	9310ALCSM472601235	IC (Elementary)
X	1	UPS	SMART500RT1U	Tripp-lite Smart 500	9310ALCSM472601179	MC (High School)
Y	1	UPS	SMART1500	APC Smart 1500	AS0213130227	MC (High School)
Z	1	UPS	MBK550E	Minuteman UPS	3052030500071	MC (High School)
AA	1	UPS	SMART2200RMXL2U	Tripp-lite Smart 2200 Rack-Mounted	9250AF0SM462800695	MC (High School)
AB	1	UPS	SMART3000RM2U	Tripp-lite 3000 Rack-Mounted	9328AD0SM453000082	MC (High School)
AC	1	UPS	SMART500RT1U	Tripp-lite Smart 500	9310ALCSM472601236	Jr. High Closet
Other equipment						
AD	1	Router		Router		MC (High School)
AE	1	Access Point	DWL-2100AP	D-Link Wireless Access Point	0R36148001599	High School
AF	1	Access Point	DWL-2100AP	D-Link Wireless Access Point	0R36148001619	High School
AG	1	Access Point	DWL-2100AP	D-Link Wireless Access Point	0R36147006079	High School
AH	1	Firewall	WIC40500	Watchguard Firebox X500	808012679-75A8	MC (High School)
AI	1	Backup	112T	Dell Power Vault	2183813	MC (High School)
Phone System						
AJ	1	PBX	3C10111C	3Com NBX 100	531375444	MC (High School)
Network Interface Cards						
AK	350	NICs		Network Interface Cards		Throughout
386 Total equipment (network electronics)						
Cabling Infrastructure						
AL	353	Data Drops		Cat 5 data drops		Throughout
AM	26	Voice drops		Cat 5 Voice drops		
AN	5	Coaxial Cable		Coaxial cable drops		
AO	5	Fiber Optic		Fiber Optic backbone		
AP	5	Voice Backbone		25 pair Voice Backbone		
394 Total network infrastructure (cabling)						
780 Grand total						

We, Leggett ISD, feel that the way the SLD calculated the cost per piece of equipment was not a fair representation of the actual equipment maintained, therefore we are asking for a review of this denial as it will place undo burden upon our District.

Thank you for your attention

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